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April 11, 2008

VIA HAND DELIVERY

Honorable Richard M. Berman
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

***RE: Wells Lamont, Inc. v.
M/V "X-PRESS RESOLVE" and
Hanjin Shipping Co., Ltd.
S.D.N.Y. Index No.: 08 CV 2519 (RMB)
Our File: 64-07-861***

Dear Judge Berman:

We are writing to you on behalf of all parties to request a 30-day adjournment of the Pre-trial Conference currently scheduled for Tuesday, April 15, 2008 at 9:00 a.m. There has been no previous request.

As counsel for plaintiff, we were contacted today by the representatives of the defendants, P&I Club who were just provided with the Summons and Complaint by their assured. They would like a brief period of time to obtain the documents and appoint counsel so we are able to discuss possible settlement. In the event settlement is not possible, counsel will need a chance to review the matter and can then appear before Your Honor and discuss a Scheduling Order.

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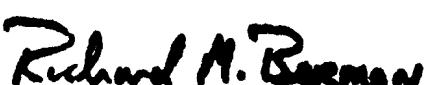
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We would therefore jointly request the adjournment for approximately 30 days. At the present time the only conflicts we are aware of are on Monday, May 5 and Tuesday, May 20 and Friday, May 23, 2008 for scheduling an adjourned date. We thank the Court for its indulgence.

Respectfully yours,

McDERMOTT & RADZIK, LLP
By: 
William R. Connor III

WRC/hs

<p><u>CONFERENCE ADJOURNED TO 5/19/08</u> <u>AT 9:00 A.M.</u></p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>	
<p>SO ORDERED: Date: <u>4/11/08</u></p>	<p> Richard M. Berman, U.S.D.J.</p>